

1 MICHAEL D. GREEN, ESQ., SBN 214142  
2 [mgreen@abbeylaw.com](mailto:mgreen@abbeylaw.com)  
3 BRIAN G. LANCE, ESQ., SBN 300227  
4 [blance@abbeylaw.com](mailto:blance@abbeylaw.com)  
5 ABBEY, WEITZENBERG, WARREN & EMERY, P.C.  
6 100 Stony Point Road, Suite 200  
P.O. Box 1566  
Santa Rosa, CA 95402-1566  
Telephone: 707-542-5050  
Facsimile: 707-542-2589

7 Attorneys for Plaintiff Jeremy Harkins

8 UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF CALIFORNIA

9  
10 JEREMY HARKINS ) Case No.: 2:20-CV-00347-KJM-JDP  
11 Plaintiff, )  
12 v. )  
13 SUTTER COUNTY; SUTTER COUNTY'S )  
14 SHERRIFF DEPARTMENT; )  
15 CALIFORNIA FORENSICS MEDICAL )  
16 GROUP; TAYLOR FITHIAN, M.D.; )  
17 DORIS BROWN, FNP; SHERILL )  
18 McGuire, RN; LISA ROGERS, RN; )  
19 SHERIFF BRANDON BARNES; )  
20 CAPTAIN DAN BUTTLER; SERGEANT )  
21 HERNANDEZ; SERGEANT GARCIA; )  
22 SERGEANT EATON; OFFICER E. )  
23 BROOKS; OFFICER OLSON; OFFICER )  
24 SANTOS; OFFICER WEATHERUP; )  
25 WELLPATH MANAGEMENT, INC.; )  
26 THOMAS PANGBURN, M.D. AND )  
27 DOES 1-50, )  
28 Defendants. )

**STIPULATION RE DISCOVERY CUT-OFF DATES & FUTURE PROCEEDINGS**

IT IS HEREBY STIPULATED by and between the Parties, through their respective  
counsel of record, that the following current discovery cut-off dates and future proceedings of

- 25 (1) **Fact Discovery:** September 29, 2021;
- 26 (2) **Expert Disclosures:** October 29, 2021;
- 27 (3) **Expert Discovery:** January 29, 2022;
- 28 (4) **Law and Motion:** March 4, 2022;

**(5) Scheduling of pretrial and trial:** The parties propose that any modifications to standard pretrial or trial proceedings be requested by March 28, 2022.

be continued three months, with the new dates being:

- (1) **Fact Discovery:** January 24, 2022;
- (2) **Expert Disclosures:** February 21, 2022;
- (3) **Expert Discovery:** May 23, 2022;
- (4) **Law and Motion:** July 15, 2022;
- (5) **Scheduling of pretrial and trial:**  
modifications to standard pretrial or trial pro

Good cause exists for this extension as discovery in this case involves numerous depositions, and discovery has been delayed due to the ongoing pandemic. Plaintiff has also recently identified an additional defendant, Dr. Matthew Foskey, after taking the deposition of Doris Brown in August of 2021. Plaintiff will file an amended complaint shortly.

All parties have also agreed to private mediation with Hon Maria-Elena James with a deadline to mediate by January 24, 2021.

This is the third request for a discovery cut-off extension.

IT IS SO STIPULATED.

DATED: September 22, 2021

ABBEY, WEITZENBERG, WARREN & EMERY

By: /s/Brian G. Lance

Michael D. Green

Brian G. Lance

Attorneys for Plaintiff

1  
2 DATED: September 22, 2021

LAW OFFICES OF JEROME M. VARANINI

3 By: /s/Jerome M. Varanini

4 Jerome M. Varanini  
5 Attorneys for Defendants, California  
6 Forensic Medical Group, Inc.; Wellpath  
7 Management, Inc.; Doris Brown, Lisa  
8 Rogers, and Sherril McGuire

9 DATED: September 22, 2021

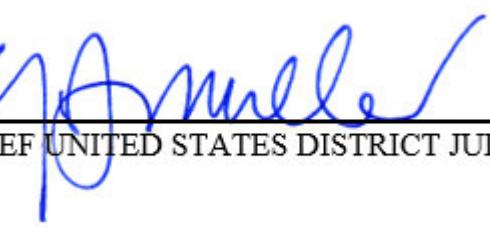
BURKE, WILLIAMS & SORENSEN, LLP

10 By: /s/Gregory B. Thomas

11 Gregory B. Thomas  
12 Michael A. Slater  
13 Attorneys for Defendants Sutter County,  
14 Sheriff Brandon Barnes, Captain Dan  
15 Buttler, Sergeant Gloria Hernandez, Sergeant  
16 Jose Garcia-Cortes, Former Sergeant Lester  
17 Eaton, Officer Ethan Brooks, Sergeant  
18 Kaitlyn Olson, Officer Laurie Helzer, and  
19 Officer Michael Weatherup

20 IT IS SO ORDERED.

21 DATED: September 22, 2021.

22   
23 CHIEF UNITED STATES DISTRICT JUDGE